

Explicit and implicit diversity policy in the UK film and television industries

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Abstract

This article adapts Jeremy Ahearne's (2009) conception of explicit and implicit cultural policy for a novel analysis of contemporary diversity policy in the British film and television industries. It demonstrates how distinguishing explicit and implicit diversity policy enables a better understanding of the policies, practices and strategic actions that impact workforce diversity outcomes. We provide an in-depth analysis of the different types of intervention that have been used to increase workforce diversity in the film and television industries in the UK since 2012. We then examine the arguments used to justify increased workforce diversity, focussing on the 'business case for diversity' and the logics which underpin it. Drawing on our own research as well as industry reports and secondary literature, we examine the explicit and implicit workings of these policies and how they affect workforce diversity outcomes. We argue that the implicit/explicit dichotomy nuances and improves our understanding of the competing and contradictory forces that shape strategic courses of action towards workforce diversity in the film and television industries, and a more nuanced conceptualisation of diversity policies and their outcomes.

Keywords: diversity, film policy, television policy, business case

Introduction

Diversity is at the forefront of research, policy and public debate on the UK film and television industries. Once primarily a proxy for race, the term diversity has broadened and now includes wider socio-demographic characteristics of both film and television audiences and those who work in the industries. Almost two decades after what is now the UK's Department for Digital, Culture, Media and Sport (DCMS) enshrined as one of the UK Film Council's goals the aim to 'support and encourage cultural diversity and social inclusiveness' (Film Council 2000: 9), the lack of workforce diversity in film and television is now widely recognised as problematic, in the UK and internationally. Social media campaigns such as #OscarsSoWhite and #BritsSoWhite have exposed the underrepresentation of non-white workers; #Actorawareness has drawn attention to the barriers actors from working class origin face, and the #MeToo movement has highlighted how gender-based power imbalances in workplaces have enabled bullying and harassment to inhibit diversity and inclusion.

Despite significant academic, industry and policy attention, however, improvements in workforce diversity have been demonstrably slow: women, disabled workers and workers from minority ethnic and working-class backgrounds remain underrepresented in the workforce overall, and especially in positions of power and influence (e.g. Directors UK 2014, Creative Diversity Network 2018, CAMEo 2018). This uncomfortable truth has animated academic debate (e.g. Moody 2017, Nwonka 2015, Wreyford 2015). This paper contributes to that debate of diversity policy in the UK film and television industries with an application of Jeremy Ahearne's (2009) distinction between explicit and implicit cultural policies. We argue that Ahearne's lens allows a more nuanced understanding of the practice and policy environment for workforce diversity in film and TV and of the various factors that affect the efficacy of diversity interventions, and that thus ultimately shape opportunity, representation and access.

Ahearne (2009) proposes to distinguish between explicit and implicit cultural policy in order to understand the effects not only of policies that are explicitly directed towards culture, but also those that have effects upon culture without being labelled as cultural policy. In the next section we outline this distinction and how it might be applied to diversity policy. Using Ahearne's analytical lens and the UK as the empirical footprint, the subsequent two sections explore the explicit and implicit policies surrounding interventions to increase workforce diversity and the business case for diversity. The choice of these complimentary cases is deliberate. Firstly, interventions are the key explicit policies aimed at improving

workforce diversity, but that have implicit diversity policies working through and alongside them. Analysing interventions to increase diversity in conjunction with these implicit diversity policies improves our understanding of how diversity interventions work, and what unintended consequences they might have. Secondly, the business case for diversity is a prominent theme in explicit diversity policy and increasingly used to justify interventions to increase workforce diversity. While it, too, has implicit diversity policy working through it, our analysis shows how the business case needs to be seen in relation to creative industries policy more broadly to understand its pervasiveness, power and potential for detrimental unintended consequences. The final section brings together our analysis of interventions to increase workforce diversity and of the business case for a concluding discussion of how distinguishing explicit from implicit policies allows a more circumspect critical appreciation of diversity policy for film and TV.

Explicit and implicit diversity policy

In a research paper (2004) and subsequent article (2009), Jeremy Ahearne argues that useful analytical distinctions can be drawn between two kinds of cultural policy, explicit and implicit. Explicit cultural policy is ‘any cultural policy that a government labels as such’ whereas implicit cultural policy is ‘any political strategy that looks to work on the culture of the territory over which it presides (or on that of its adversary)’ (2009: 143). The usefulness of this distinction is that it can help us to

measure a modern government’s explicit cultural policy (what it proclaims that it is doing for culture through its official cultural administration) against its implicit cultural policy (the effective impact on the nation’s culture of its action as a whole, including educational, media, industrial, foreign policy, etc.) (2009: 144).

Explicit cultural policies are relatively straightforward to identify: they are normally clearly signposted as cultural, whether instigated by a government (in the UK predominantly Department for Digital, Media, Culture and Sport) or cultural sector organisations (in the UK predominantly arm’s length, non-departmental public bodies such as Arts Council England or the British Film Institute). Implicit cultural policies are less easily detected. They comprise policies and deliberate courses of action that are intended to shape culture but are not labelled as such. Economic policy that focuses innovation and infrastructure investments on particular industries (such as the UK Government’s Industrial Strategy 2017), or education policy that

prioritises teaching IT skills over arts subjects are prominent examples. Such strategic courses of action have unintended ‘cultural side effects’ that, Ahearne argues, need to be considered to understand how arts and culture are shaped. Importantly, Ahearne suggests the distinction between explicit and implicit cultural policy be applied beyond explicit governmental actions and used to explore the entire policy environment. That broader environment would include official and unofficial, stated or unstated policies of organisations, companies and other non-governmental social actors. Ahearne notes, for instance, that much cultural policy, defined as ‘strategic courses of action designed to prescribe and shape cultural practices’, is developed in the ‘boardrooms of powerful transnational commercial organisations’ or is to be found in algorithms and the use of big data (2009: 144).

We propose that Ahearne’s analytical tool is a useful lens through which to understand and assess the operations of workforce diversity policy operating in the British film and television industries. Following Ahearne’s conceptualisation, we understand as *explicit diversity policies* those discourses, actions and interventions at the level of government, organisations, companies and other social actors that make a clearly stated attempt to increase the diversity of the film and television workforces. Explicit diversity policy tends to be signposted as such: at the level of government, for instance, it outlaws discrimination in relation to certain diversity characteristics (e.g. the 2010 Equality Act in the UK). At company level explicit diversity policy declares increased diversity as a strategic aim (for instance Channel 4’s *Diversity charter* or Ofcom’s *Diversity and inclusion programme 2018-2022* [2018]), introduces measures to encourage underrepresented groups into certain actions or behaviours (e.g. mentoring or training initiatives aimed at women or black, Asian and minority ethnic (BAME) workers), or openly seeks to affect changes in industry culture and practice that result in increased participation of more women or members of minority groups (e.g. the BFI’s *Diversity Standards*). *Implicit diversity policies* are much more amorphous: they include the unintended consequences of explicit diversity policy as well as policies and actions that are not explicitly addressed towards workforce diversity, but which nevertheless affect it. Implicit diversity policies comprise, for instance, cultural, media and economic policy that affects labour markets in diversity-relevant ways; education or social policy that indirectly shapes young people’s equality of access to arts and culture; and the policies and practices of non-governmental institutions, companies and other social actors that are not labelled as concerned with workforce diversity but intentionally or

unintentionally affect the workforce participation of individuals from certain groups – including through omitting diversity considerations.

Applying this distinction, we argue, allows us to produce a more nuanced understanding of the British film and television industries’ diversity policy environment and the ways in which explicit and implicit diversity policies intersect and produce diversity outcomes. In the following sections we apply the distinction between explicit and implicit diversity policy to two purposively chosen examples that dominate the current diversity discourse in the UK’s film and television industries: interventions to increase diversity and the business case for diversity. In so doing, we draw predominantly on an in-depth review of workforce diversity research for the UK screen sector 2012-16 (see CAMEo 2018), supplemented with key research either side of that period.ⁱ Our intention is not to provide a full analysis of all the strategic courses of action that contribute to the UK’s poor progress towards equality in the film and television industries, or to add to the now extensive literature that documents the barriers to equality of participation (for a fuller review of these see, e.g., CAMEo 2018). Rather, our aim is to illustrate how the lens of implicit and explicit diversity policy can broaden our understanding and critical engagement with diversity policy and practice.

Interventions to increase workforce diversity

Interventions to increase workforce diversity constitute the majority of the explicit diversity policies of the major UK broadcasters and non-governmental sector bodies, such as the BBC, Channel 4, Screenskills and the British Film Institute. Interventions might be undertaken in training and education, by individual employers or as sector wide initiatives. They are generally designed to increase the numbers of workers from underrepresented social groups, particularly women, BAME people and to a lesser extent disabled people, that enter, remain or progress in film and TV work. This section analyses interventions to increase workforce diversity as explicit diversity policy and with respect to the implicit diversity policies that work through or alongside them.

Interventions to increase workforce diversity can broadly be divided into two categories: *empowering* interventions and *transforming* interventions (CAMEo 2018). Interventions in the first category aim to *empower* individuals from underrepresented groups by enhancing their capacity or likelihood for workforce participation. They typically take the

form of training or mentoring initiatives designed to acquire skills, experiences, networks and connections that individuals from a particular group are less likely to come equipped with. Examples of empowerment interventions include the BBC's *Extend* programme which provides paid training placements for disabled production workers; Channel 4's *Production Trainee Scheme* which offers twelve month paid placements alongside training and is targeted particularly at disabled people and people from BAME backgrounds; Screenskill's *Buddy Programme* developed in partnership with The TV Collective which matched six BAME workers to experienced industry professional mentors, or the long-running Women in Film & Television UK *WFTV Mentoring Scheme* aimed at helping established women workers progress into more senior positions.

Empowering interventions have become the most prominent sector response to the lack of workforce diversity in the UK's film and TV industries and a key form of explicit diversity policy. Anecdotal evidence suggests that certainly for some individual cases these interventions have been effective and have helped individuals who were talented but for one reason or another less likely to succeed establish a career in film or TV (see, for example, the case studies in the BBC Equality Information Report 2016/17). It is notable, however, that for the UK we could not find any publicly available systematic evaluations of empowering interventions. Applying Ahearne's lens of implicit diversity policy, however, two sets of strategic courses of action working implicitly through empowering interventions become visible: strategies for deploying talent, and conceptualisations of workforce diversity.

Firstly, while empowering interventions can facilitate access to work or employment opportunities, there is also evidence that they lead to *strategies for deploying talent* that place limits and barriers upon equality through processes of ghettoization and reaffirmation of negative assumptions and stereotypes. For example, Randle and Hardy's research (2016) highlights that, on the one hand, specialist programming for viewers with impairments is important for *empowering* disabled workers by providing entry routes to the industry. The BBC was singled out repeatedly by Randle and Hardy's interviewees as providing opportunities for disabled people through its specialist programming. On the other hand, because specialist disability programming was generally perceived as less valuable, of secondary importance and of poorer quality, being deployed in specialist disability programming rarely presented an opportunity for horizontal career movement. While specialist disability programming provided important mechanisms for gaining a foothold in the industry, individuals then faced a 'glass partition' that blocked progression into more prestigious programming.

Similarly, Saha (2012) evidences the ambiguous role of broadcasters in both providing potentially ‘empowering’ career entry points but also limiting opportunities for ethnic minority workers through ethnicity-specific deployment. With public service remits committing them to broadcasting ‘minority-interest’ programmes’, the BBC and Channel 4 have become important but also almost exclusive hosts for ‘Asian filmmakers who make stories about Asian lives for terrestrial television’ (Saha 2012: 427). However, Saha also found that in order to succeed, BAME cultural producers often felt compelled to become complicit in the racialized assumptions that dominate producer conceptions of what constitutes ‘minority programming’. For example, Saha describes how one of his respondents, an Asian freelance director/producer, was approached by BBC commissioners ‘to make documentaries about the British Asian community, one about caste prejudice, the other about skin lightening – what she described as “sensationalist stories” that she often felt “perpetuated false stereotypes” (she turned both of them down)’ (2012: 430). This common experience shows how, for Saha, ‘difficult issues of “race”, ethnicity and religion are constructed in reductive terms that conceal the complex and subtle circumstances underlying the cultural phenomena being explored’ (2012: 430).

Saha’s as well as Randle and Hardy’s research demonstrates how explicit policies that aim to empower underrepresented groups lead to ‘ghettoization’ in the deployment of talent: the concentration of ‘diverse’ subjects within specific and often stereotypical positions and linked to stereotypical outputs. Such outcomes are problematic on two levels. At the individual level, ghettoization constrains the work and employment options of the ‘empowered’ workers. At an industry level, the concentration of workers from particular groups in stereotypical positions and working on stereotypical outputs reproduces assumptions and prejudices linked to the respective underrepresented group, and thus maintains and exacerbates inequality – a process that Saha (2018) describes as racial product differentiation. Empowering interventions are particularly problematic if they are merely aimed at increasing the workforce participation of individuals from specific groups, because, as Nwonka (2015: 87) emphasises, ‘it is problematic to assume that [greater participation] will inevitably lead to a shift in the very discriminative nature of the film industry or have any impact in key decision-making roles in the sector’ (see also European Women’s Audiovisual Network 2016). Empowering interventions can therefore have the unintended implicit side effects of reinforcing, not undermining, negative stereotypes.

Secondly and somewhat more fundamentally, attention to implicit diversity policies shows how empowering interventions use and reproduce a particular *conceptualisation of*

workforce diversity that can work against the aims of explicit policy. Most empowering interventions are based on and reproduce what we propose to call a deficit model of workforce diversity: the view that certain individuals lack something (e.g., resources, connections) and need help to make good that shortfall in order to have access to work and employment. This deficit model places the reason for a lack of diversity with the individual, and its unspoken underlying assumption is that if individuals were not deficient (in whatever form typical for the group they belong to), workforce diversity would not be a problem. The logical consequence of these assumptions is to propose interventions that attempt to mitigate these ‘individual deficiencies’ in order to enable marginalised individuals to compete more equally with white, male, middle-class and able-bodied individuals. Doing so, however, individualises the problem and obscures from view the wider structural causes of inequality. There is comprehensive evidence that values, practices and structures influence how opportunities are allocated (e.g. Eikhof 2017, Taylor & O’Brien 2017, Wreyford 2015). Gender, class, ethnicity, disability, and other intersecting categories of inequality matter not in themselves but *in relation to* specific practices and structures. It is only because, for instance, recruitment is based on specific personal networks and connections, which women workers, disabled worker and workers from ethnic minority or working-class backgrounds are less likely to access (Grugulis & Stoyanova 2012, Randle & Hardy 2016, Taylor & O’Brien 2017), or because selection criteria prioritise Eurocentric, middle-class habitus, dispositions and knowledge workers from ethnic minority or working class backgrounds are less likely to come equipped with (Banks 2017, Eikhof 2017) that systematic disadvantage arises. By focusing on the ‘deficient’ individual worker, the deficit model overlooks the primary, structural causes of unequal opportunity (e.g. discriminatory recruitment practices) and the possibility to increase workforce diversity through addressing these causes (e.g. establishing recruitment practices that are less exclusionary). The deficit model leaves no room for understandings of discrimination that are rooted in histories of racism, sexism, the reproduction of class inequality, and so on. Because of the deficit model of diversity that operates, implicitly, within and through them, empowering initiatives have a tendency to preserve, reproduce and entrench inequalities rather than effectively reduce them. The use and reproduction of the deficit model thus constitutes an important implicit policy that affects diversity outcomes.

While empowering interventions constitute the major sector responses to the lack of workforce diversity, there is increasing recognition in policy, practice and academic research of the need for differently targeted, structural reform (for the academic debate see, e.g.,

Eikhof & Warhurst 2013, Randle et al. 2015) and for interventions that we have elsewhere termed *transforming interventions* (CAMEo 2018): interventions aimed at changing exclusionary practices and processes rather than at empowering individuals from underrepresented groups to more successfully navigate the existing exclusionary system. For example, a 2016 report by the European Women's Audiovisual Network compares initiatives to increase gender equality in film and television across seven European nations (Croatia, Austria, Sweden, France Germany, Italy and the UK). For the UK specifically it notes 'welcome steps in the right direction' but queries their efficacy for addressing 'deep-rooted problems', and concludes that 'assuming there is the political will to achieve gender equality for UK directors, stronger, coordinated action will be needed across the film and television institutions' (European Women's Audiovisual Network 2016: 4). The same report presents a pan-European survey of 900 male and female film and television workers that found widespread support for transforming interventions. Respondents were asked what initiatives they thought would be most effective for supporting women's careers. Gender equality in funding commissions was considered important by almost all respondents, especially women (94% of woman respondents considered this aspect important). Targeted production funding, incentives for producers to work with woman directors and increased funding for first and second films were also considered important, with an 80-88 per cent response. Woman respondents especially favoured increased support for distribution (84% as opposed to 77%). Three out of four respondents (77%) believed that quotas for state funding would help to achieve change. In the UK, such requests for systemic change are becoming more prominent, too, for instance in research undertaken by the group Raising Films. Their study of workers with caring responsibilities in UK film and TV also evidenced the need for transforming interventions to increase gender equality:

There is a strong desire for cultural change within the industry to support these structural changes towards a more equal workplace, in order for parents and carers to have genuine and fair access. Changes such as the reduction of anti-social hours are seen as being beneficial for all – including audiences, who will reap the benefit of a more diverse creative cohort working in film and television. (Raising Films 2016: 1)

Importantly, interventions such as those demanded by the European Women's Audiovisual Network or Raising Films' respondents would not target individual woman producers or directors and would not seek to better equip 'deficient' individuals with skills or connections for a screen sector career. Instead, these interventions would seek to alter the context in which women work and produce; they would seek to *transform* sector practice and remove

barriers to more equal participation. Transforming interventions aim to systematically change sector practices and processes in ways that make gender, ethnicity, class or physical ability less relevant for accessing opportunity. Transforming interventions can work at the level of individual organisations (e.g. reshaping recruitment processes or delivering unconscious bias training for decision makers) as well as at industry levels (e.g. linking funding awards to practices that facilitate equal opportunity). Prominent examples in explicit diversity policy from the UK include the BFI *Diversity Standards*, which requires all funded projects to demonstrate how they increase workforce diversity in National Lottery-funded films; Channel 4's *360° Diversity Charter* which includes new commissioning guidelines to ensure that at least one lead character in scripted programmes has a disability or is from an ethnic minority background or is lesbian, gay, bisexual or transgender; and the BBC's *Diversity Commissioning Code of Practice* which commits to, amongst other things, increasing diversity in senior management and creative roles, and ensuring all casting is open and fair.

Transforming interventions constitute explicit diversity policy that is qualitatively different to the empowering interventions. While empowering interventions seek to, one by one, make each individual more likely to overcome exclusionary barriers, transforming interventions would eradicate the barriers, and with them the need for empowering interventions. However, despite this support for more transformational interventions, these have been slow to materialise and often prove controversial within the industry, requiring uneasy coalitions of stakeholders and the forging of alliances to implement and run. A key industry response to the Weinstein scandal and campaigns against sexual harassment in the screen industries (e.g. Dean 2017), the revelation of gender pay gaps at the BBC (e.g. Banks 2017) and prominent industry figures speaking up against the underrepresentation of BAME and working class talent (e.g. Hatterstone 2015, BBC 2016) has been to increase efforts of data collection to therefore evidence the diversity of the film and television workforces and enable progress to be measured. Major examples include Ofcom's annual 'Diversity and equal opportunities in television' report and most recently, Project Diamond, a diversity data collection project run by the Creative Diversity Network (whose membership includes BAFTA, the BBC, Channel 4, Channel 5/ Viacom, Screenskills, PACT, ITN, ITV, Media Trust, S4C, Sky and Turner Broadcasting) and funded by UK's the major broadcasters. Project Diamond, which has received the most attention in the UK, is an illustrative case. According to its first report, the project

represents a committed decision by leading UK broadcasters to make change [...] Diamond is a game changer [...] The broadcasters have started something that means it will never be possible or acceptable to say ‘We don’t know’ when talking about diversity in the UK television industry. [...] It [Diamond] will be the core tool that we use to discuss with our members and stakeholders, and beyond, the interventions and programmes of work that we are planning for the future. (Creative Diversity Network 2017: 3 and 5)

Both more and better diversity data is indeed an important prerequisite for understanding the lack of diversity and what might potentially be done about it. However, data initiatives in themselves do not – and are not intended to – address the sources of systemic disadvantage. As the Project Diamond report explains, data and in particular workforce statistics provide ‘a core tool [...] to discuss [...] interventions and programmes’ (Creative Diversity Network 2017: 5). Moreover, while they are important, an exclusive focus on data initiatives as explicit diversity policies has considerable potential for counter-productive implicit diversity policies and unintended consequences. Underlying many data initiatives is the assumption that change and progress are hampered by a lack of evidence and understanding of poor workforce diversity. Similar to the way that empowering initiatives can contribute to establishing a deficit model of diversity, data initiatives can establish the lack of diversity as an inscrutable and unknown problem (‘not enough knowledge/data’), rather than one rooted in industry practices that afford or withhold opportunities. Because data initiatives are – have to be, statisticians would argue – large scale, concerted, resource-intensive cross-industry efforts they appear to affect industry change of a transforming nature. But while they may transform the ways in which the industry makes itself knowledgeable about diversity, data initiatives do not in themselves transform the practices from which a lack of diversity arises. Given the current discourse around diversity data collection in the UK film and TV industries, we argue that the implicit unintended consequence of this explicit diversity policy may be for large scale attempts to address a ‘lack of knowledge’ problem to divert attention – and resources – from initiatives that transform exclusionary industry practices in themselves.

The business case for workforce diversity

In this section we turn our attention from the aims and nature of diversity initiatives to a cross-cutting theme in explicit diversity policy for the UK’s film and television industries: the ‘business case’ for diversity, i.e. the argument that increased workforce diversity positively impacts financial or commercial success by, for example, enhancing creative capacity,

increasing levels of innovation or creating cultural products with broad or niche appeal. It is closely related to the notion of individual creativity and talent as central to economic and commercial innovation that is to be found in, for example, Richard Florida's understandings of the 'creative class' as the engine of economic competitiveness (Florida 2002). Explicit diversity policy – in Ahearne's (2009) terms, diversity policy 'that is labelled as such' (p. 143) – has become replete with the notion that 'more diverse teams do better' and is increasingly instrumentalised towards generating the perceived competitive advantage derived through the utilization of the 'diverse' workers' human capital, particularly in creative roles. An illustrative example is the Great British Diversity Experiment, a report on workforce diversity for the communications industry, which, without offering further evidence, simply states 'We all know that diversity is better for business' (The Great British Diversity Experiment 2016: 2). Similar examples can be found in reports by the BBC (2013), Creative Scotland (2015) and Directors UK (2014, 2015). Business case-thinking in various forms might be considered as constituting much of the contemporary justification for efforts to increase workforce diversity, complementing, or – arguably – competing with and even supplanting justifications rooted in social justice. The following, firstly, outlines the business case for diversity and explores its potential unintended consequences, and secondly analyses the public policy environment that surrounds and, we argue, supports it.

Explicit diversity policy in the UK draws heavily on McKinsey & Company's 'Diversity Matters' report (Hunt, Layton, & Prince 2015), which found a statistically significant relationship between more diverse leadership teams and better financial performance. Gender diversity and ethnic diversity made above-average financial performance 15 and 35 per cent more likely, whereas companies with less diverse management boards were significantly less likely to financially perform better than average (ibid. 2015: 1). Key interpretations (cf. p.9) are that drawing from a more ethnically and gender-diverse talent pool increases a company's skills base; that it can strengthen consumer orientation; that employees like working in more diverse environments; that workforce diversity fosters innovation and creativity; and that it enhances a company's image. Take-up of these arguments in the creative industries is prominently illustrated in the Creative Industries Federation's (2015) 'Creative Diversity' report. Adapting ideas from 'Diversity Matters', this report posits that failing to diversify would mean wasted business opportunities because, for instance, the BAME population will make up nearly a third of the UK's population by 2050 and its disposable income increase 10-fold in the decade from 2001; because women influence 80% of buying decisions and by 2025 are expected to own 60% of

all personal wealth; or because that only 14% of workers in the £1.7 billion video games industry are women although women play more than half the games (Creative Industries Federation 2015: 2). The financial benefits/lost opportunities-narrative has become a prominent theme in advocacy as well, for instance in activist group Raising Films' report:

We have to support a diverse range of voices, talents and skill-sets. By discriminating (even unconsciously against those who have other responsibilities, we are potentially letting a wealth of talent slip through the cracks. The result is a homogenized industry that doesn't benefit the business or the audience.

Female respondent, Raising Films Survey (2016: 12)

However, the primacy of the business case for diversity across explicit diversity policy is not matched by the robustness of its evidence base. Policy and industry reports marshal mainly anecdotal evidence. A UK Film Council-commissioned report from 2007 found mostly circumstantial evidence from outside the film and television sectors to demonstrate commercial benefits of greater diversity and concluded that 'a range of factors may contribute to better financial performance and it is difficult to argue that diversity alone causes an increase or decrease' (Bhavnani 2007: 158). While there is a strong perception that commercial benefits of greater diversity exist, especially film and TV-specific evidence is both incomplete and much less compelling than explicit diversity policy implies (e.g., Dodd 2012). A systematic literature review undertaken by the UK's then Department for Business, Innovation and Skills (BIS) concludes that greater workforce diversity can increase company performance but not to 'all firms in all contexts at all times' (2013: vi). The BIS review also emphasises that greater workforce diversity can be a net cost, particularly for smaller firms, and that 'firm's economic and organisational context is crucial in determining how equality and diversity brings about business benefits' (p.vi).

From these general interrogations follow film & TV specific-questions. For instance, the film and TV industries comprise a high share of owner-run, micro-, small and medium-sized businesses, and the BIS report suggests that for such businesses, the costs of diversity initiatives may have a bigger influence than the diversity of its leadership. In film and TV commercial outcomes are substantially influenced by decision makers below the top-level management teams upon which diversity research typically focuses, in particular by creative teams or 'below the line' production roles, and there is currently little research on how the diversity of staff in those positions affects the commercial success of outcomes. Lastly, existing research makes the business case for diversity largely based on research into gender and ethnicity. Conclusions about the financial benefits of a higher representation of other

underrepresented groups that are particularly relevant to film and TV are thus more speculative than founded in evidence. Of course, these internal critiques do not prove that more diverse workforces do *not* bring business benefits. But despite its prominence in policy and practice publications, rigorous examination of the business case for diversity in film and TV specifically is still outstanding. This scrutiny is especially needed as, depending on the metrics used, one might even argue that while its whiteness, maleness, able-bodiedness and middle classness has become increasingly controversial and morally untenable, lack of diversity does not seem to have prevented the film and television industries' from achieving demonstrable financial and market success.

Parking, for a moment, the potential contradiction between its validity and ubiquity, we now examine the implicit courses of action and argument as well as their unintended consequences of the business case for diversity. Doing so reveals that the business case argument establishes a return on investment-approach to workforce diversity: the costs of increasing diversity are evaluated with a view to the return on investment they offer, to film and television companies or to the economy as a whole. The language of return on investment or cost/benefit is well established in business practice and economic policy, which means that the business case for diversity speaks to rationales that are not only widely known, but also recognised as legitimate. Diversity policy that centres on the business case and uses, in word or spirit, the language of return on investment, or cost/benefit, offers a rationale that is easy for businesses and economic policy to relate to and to justify translating into action. On the one hand, if the positive link between more diverse teams and 'better business performance', in a broad sense, can be convincingly demonstrated, using the business case for diversity as a strategic course of action therefore has the potential to lever diversity-conducive change in business practice and economic policy.

On the other hand, the business case for diversity also has the potential to bring about the exact opposite and to undermine the any attempts to increase workforce diversity, dangerously and irrefutably so. The return on investment-rationale is not content with establishing a positive return for an investment. Rather it seeks to enable comparisons between alternative courses of action with respect to their likely contribution towards a desirable outcome. The business case for diversity establishes that desirable outcome as financial or business performance. It explicitly acknowledges, reproduces and thereby legitimises the idea of evaluating alternative workforce diversity interventions with regard to their return on business performance. In doing so, the business case for diversity invites two problematic and potentially lethal considerations. Firstly, the logical consequence of the

return on investment-approach is to compare the expected benefits for alternative initiatives to increase diversity. If, for instance, as McKinsey & Company's 'Diversity Matters' report suggests, companies with ethnically diverse management are 35 per cent more likely to have above-average financial performance while companies with gender diverse management boards are only 15 per cent more likely to do so, business case thinking would urge investing in initiatives to increase ethnic diversity at the expense of gender equality initiatives. Similarly, different types of investments aimed at the same diversity characteristic start to compete with each other, leading, for instance, as Cullen and Murphy (2018) show, to the prioritization of gender equality initiatives that support highly educated members of the female workforce (e.g., increasing female representation on management boards) over initiatives that seek to promote equality between men and women more generally (such as the equalization of domestic work or better universal childcare). The return on investment-rationale thus sets different investments in increased diversity in competition with each other. Secondly and by the same logic, the return on investment-rationale pits initiatives to increase diversity against any other investment that might improve company performance, e.g. the introduction of new technology. Where these alternatives promise a better, or even just a more clearly evidenced return, the business case for diversity would have accepted and established a rationale that argued against any investment in diversity whatsoever. Although this outcome would be the opposite of what the business case for diversity is deployed to achieve, it would become compelled by its own logic and implicitly undermine social justice rationales.

As the previous section has shown, the business case for diversity both lacks evidence, especially for the film and TV industries, and has the potential to cause fundamentally detrimental, unintended consequences. To understand why it has still become so powerful and pervasive, the business case argument needs to be seen in the context of other implicit diversity policies that support and reinforce it. To return once more to Ahearne's (2009) definitions, implicit policies include the effective impacts of governmental actions as a whole. For our analysis of workforce diversity, we thus need to consider public policy that is intended to shape working conditions in UK film and TV but not explicitly labelled as diversity policy. In the UK, from the late 1990s onwards, such public policy experienced a turn from cultural policy to creative industries policy (Garnham 2005, Hesmondhalgh, Nisbett et al. 2015). Based on the assumption that markets constitute the best possible set of organisational relationships and values for cultural production, creative industries policy drove the commercialisation of what had traditionally been considered the

domain of cultural policy (Newsinger 2012, Banks & O'Connor 2017). This amalgamation of cultural and economic policy – or take-over of the former by the latter – was embedded in and driven by the broader political development of the time:

The shift to creative industries did not come out of the blue. It was motivated by a historically specific political context, but it brought together and was one among a range of products of strands of policy thinking going back to the early 1980s. The general context was the shift from state to market across the whole range of public provision, initiated under the Thatcher government. The Labour Party (rebranded as “New Labour”) wished to signal that it not only accepted, but wished to accelerate, this shift. This was linked to a new relationship under Chancellor of the Exchequer (i.e., Finance Minister) Gordon Brown between the Treasury and the spending departments under which public expenditure was to be seen as an “investment” against which recipients had to show measurable outputs against pre-defined targets. (Garnham 2005: 16)

This shift from state to market side-lined important questions around poor labour conditions and inequality in cultural production (Banks and Hesmondhalgh 2009; Comunian, Faggian, and Jewell 2011). Instead, creative industries policy supported and promoted companies, labour markets and working practices that have been shown to be exclusionary and replete with barriers to increased diversity (e.g. Eikhof & Warhurst, 2013; Oakley 2009): Employers seek to counter the uncertainty and risk inherent in cultural production with the use of project-based models and short-term employment, as well as recruitment through networks. These strategies for the demand and deployment of labour form powerful implicit (anti-)diversity policies that – often using public money – reproduce well-established exclusionary practices and severely constrain, if not counter, initiatives to increase workforce diversity. As implicit diversity policies these strategic courses of employment or human resource management action thus work against the explicit diversity policies espoused and enacted in the same organisational and industry domains.

Although creative industries policy as well as, for instance, film policy more specifically could, in principle, foreground issues of opportunity and inclusion, they do not necessarily do so. Jack Newsinger and Steve Presence (2018), for instance, describe how UK film policy, through film tax rebates that act as direct subsidies to mostly transnational corporations, creates a ‘corporate welfare system’ that need not concern itself with diversity and inclusion:

The ‘corporate welfare system’ for film artificially increases the size and economic activity of the commercial UK film sector but does nothing to use this leverage to shape the labour market or labour process in favour of equality of participation.

Consequently, the film industry benefits from substantial amounts of public money without the requirement to address the structural issues that prevent women, working class people, members of ethnic minorities and the disabled from participating in it. (2018: 459)

Instead, the commercialisation inherent in creative industries policy – the conscious strategic privileging of commercial values, relationships and practices – works to implicitly position diversity as desirable in so far as it contributes to the commercial success of the film and television sectors. Sarita Malik's (2013) research exemplifies the working of this implicit diversity policy environment for race, showing how the marketization of television and the adoption of the 'creative diversity' agenda have led to the depolitization of race equality:

The creative diversity agenda formulates ideas of quality and creativity over (structural) questions of (in)equality. In periodizing the shift from multiculturalism and cultural diversity to creative diversity, we see how each incarnation becomes increasingly all-encompassing; including and containing all possible forms of diversity in society [...] In fact, each element of the newest policy paradigm suggests a departure from the welfare and structural concerns identifiable in earlier (multiculturalist) media policy and an orientation toward market and industrial priorities, dealt with by creativity. (Malik 2013: 233)

Applying Ahearne's analytical lens and considering this wider policy environment of the business case for diversity thus exposes general creative industries policy as an important implicit diversity policy for film and TV: Their foregrounding of commercial success and the related discourse of creative diversity implicitly structures a policy environment where 'quality and creativity are now foregrounded over (structural) questions of (in)equality' (Malik 2013: 236) in which workforce diversity concerns that are not driven by business case considerations are at the risk of being systemically side-lined. The search for the business case for diversity, and the extent to which it has become central to explicit diversity policy in the film and television industries (despite a lack of evidence), is understandable as the logical outcome of this implicit diversity policy environment.

Conclusion

Ahearne (2009) notes that one of the dangers of the explicit-implicit cultural policy lens is its tendency towards anachronism and excessive historical sweep: the horizons of implicit policy can be continually expanded to include all manner of strategic action. However, as Ahearne also notes, one of the dangers of focussing analysis solely upon explicit policy is that we lose

the use of the term for designating the broader reality of political action on culture, thereby deflecting attention from other significant factors. If we limit our analysis to those policies and strategic courses of action explicitly designated as diversity policy, we lose the use of the term for designating the broader reality of political action that affects workforce diversity in film and television. The discussion above focussed on two specific examples of diversity policy – interventions and the business case for diversity – and illustrated in-depth the complex workings of the related explicit and implicit diversity policy in the UK film and television industries. We pointed out implicit policies such as deployment practices, conceptualisations of diversity and justifications for diversity constrain or even undermine the diversity outcomes explicit diversity policy can achieve. Consequently, any attempts to increase diversity that do not tackle the structures of the industry, including its models of production and employment, are likely to be of limited efficacy: “a meritocratic world of work cannot be delivered within the creative industries’ current model of production” (Eikhof and Warhurst 2013: 504). In aligning the aims of public policy with commercial interests and focusing state interventions on investments in established successful, but deeply problematic production models, creative industries policy normalised the idea that a lack of workforce diversity is rooted in the individual deficiencies of workers from underrepresented groups, and that initiatives to increase workforce diversity should be viewed through the lens of return on investments. These findings provide a more nuanced understanding of why explicit diversity policy prioritises empowering interventions over transformational ones, and why the business case takes precedence over social and political justice arguments.

In making this argument we do not suggest that creative industries policy completely precludes any attempt to redistribute resources and opportunity towards underrepresented groups. But we do emphasise the need to balance any analysis of more specific explicit and implicit diversity policy with analysis of their wider policy environment – in the film and television industries and beyond. Only if we consider the workings of policy within the contexts and constraints of implicit diversity policy do the fundamental inadequacies of much explicit diversity policy become visible. Understanding policies that are not explicitly concerned with workforce diversity but nevertheless affect it as *implicit policy*, indirectly or by omission, allows a more fruitful enquiry and critical appreciation of diversity policy as a whole, including its efficacy and constraints. It allows us to note that while considerable resources are being invested into training and mentorship schemes targeted at underrepresented groups, there are, at the same time, powerful implicit policies – many of which are accepted as industry standards – that continue to function as barriers to more equal

participation. It allows us to understand the business case for diversity as implicitly undermining arguments for equality rooted in social justice. It allows us to understand the powerful implicit policies that indirectly reproduce the successful industry worker as white-male and middle class. Undoubtedly there are other policies and strategic actions that could be discussed here, and that would bring some nuance to the overall picture. We contend, though, that the overall picture would likely remain the same: Given the powerful workings of implicit diversity policies, the majority of measures taken by policy and industry to improve diversity to-date will remain limited and constrained in their efficacy.

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ⁱ The year 2012 marks the publication of an influential sector review, the UK Film Policy Review (DCMS, 2012), and had therefore been chosen as the start date for CAMEo’s (2018) evidence review.